

## **REMARKS**

Applicants thank the Examiner for the second complete examination of the instant application. Claims 1-36 remain pending in the instant application, with claims 1 and 25 being the independent claims in the application. Reconsideration of this application is respectfully requested.

## **ART GROUNDS REJECTIONS**

Claims 25 and 27 stand rejected under 35 U.S.C. § 102(b) as being anticipated by Burmeister et al., U.S. Patent No. 6,027,361. This rejection is respectfully traversed.

Independent claim 25 sets forth a combination of limitations including “at least one spring clip attached to the bracket, wherein the spring clip includes a cutting blade portion adapted to cut and located proximate to the contact region.” Applicants respectfully submit, for the following reasons, that the patent document relied upon by the Examiner fails to teach or suggest at least the indicated limitation of independent claim 25.

In one embodiment of the present invention, an outer spring clip 3 includes cutting blades 4 and a subsequent cutting region 5. The arrangement according to the described embodiment is efficient in cutting and/or displacing insulation.

Turning now to the relied upon patent document, Burmeister et al. teach an insulation displacement contact 10. As is illustrated in figure 2, the insulation contact 10 includes two contact shanks 20 that have ends 22. According to the relied upon patent document, this structure enables “wires to be inserted gently and smoothly.”

The applicants respectfully submit and respectfully request that the Examiner clarify how the invention according to Burmeister et al. can enable "wires to be inserted gently and smoothly," if as the Examiner alleges, there were indeed blades on the end 22?

In accordance with the above comments, applicants respectfully submit that the patent documents relied upon by the Examiner neither teaches nor suggests at least the indicated limitation of independent claim 25. With regard to the rejected dependent claim, applicants respectfully submit that this claim is allowable at least due to its dependence upon an allowable independent claim. Accordingly, applicants respectfully request reconsideration and withdrawal of the claim rejection under 35 U.S.C. §102(b).

Various dependent claims stand rejected under 35 U.S.C. § 103(a). In particular, claims 28-29, 30, 31-35, 26, 30 and 36. With regard to the rejection of these claims, applicants respectfully submit that these claims are allowable at least due to their dependence upon allowable independent claim.

Additionally, claims 1-24 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Burmeister et al., in view of Onoue, U.S. Patent No. 5,282,758. This rejection is respectfully traversed.

Similar to independent claim 25, independent claim 1 sets forth a combination of limitations including "an outer spring clip surrounding and reinforcing the contact region, wherein the spring clip forms an insulation displacement blade in at least one end region, the blade in the at least one end region forming an entry region capable of cutting and located in front of the contact region." Applicants respectfully submit, for the reasons provided hereinabove and hereinbelow, that neither the patent documents relied upon by

the Examiner, whether in combination together or standing alone, teaches or suggests at least the indicated limitation of independent claim 1.

In an effort to make up for the deficiencies of Burmeister et al., the Examiner has relied upon Onoue. Nowhere in Onoue are the words blade or cutting, or other words that even relate to blade or cutting, used to describe cutting insulation. The Examiner alleges that Reference Number 12 of the Onoue patent document teaches "an insulation displacement blade." However, according to Onoue, Reference Number 12 relates to wire-holding members. These wire-holding members 12 function simply to hold a wire lead in place. Nothing in the relied upon patent document indicates that these wire-holding members 12 are functional for the use of cutting. In other words, there is no cutting capability that is associated with the wire-holding members 12.

In accordance with the above, Applicants respectfully submit that the recitation of independent claim 1 is neither taught nor suggested by the patent documents relied upon by the Examiner, whether taken standing alone or in combination together.

With regard to the rejected dependent claims, Applicants respectfully submit that these claims are allowable at least due to their dependence upon allowable independent claim.

Accordingly, Applicants respectfully request reconsideration and withdrawal of the claim rejections under 35 U.S.C. § 103(a).

#### **LACK OF MOTIVATION TO COMBINE REFERENCES**

Further, Applicants respectfully submit that the Examiner has shown no teaching or motivation which would lead one of ordinary skill in the art to combine the teachings of

Burmeister et al. with Onoue. In order to combine the prior art references, the Examiner must show some teaching, suggestion or motivation of the desirability of making the specific combination that was made by the Applicant. The motivation, suggestion or teaching may come explicitly from statements in the prior art, the knowledge of one of ordinary skill in the art, or in some cases, the nature of the problems to be solved. See *In re Dembiczak*, 50 USPQ2d 1614 (Fed. Cir. 1999) and *In re Kotzab*, 55 USPQ2d 1313 (Fed. Cir. 2000). No such motivation has been indicated by the Examiner.

While Burmeister et al. is directed to an insulation displacement contact, Onoue is merely directed to a **normal electrical contact** and thus has nothing to do with displacing insulation. While Burmeister et al. arguably includes some type of contact spring, and Onoue arguably includes some type of bent wire holding members 12, claim 1 calls for a spring clip forming an insulation displacement blade in at least one end region. There is nothing in Onoue, since it does not even disclose a spring clip, which would motivate one of ordinary skill to even place its wire holding members in the alleged spring clip of Burmeister et al., **let alone forming a spring clip which forms an insulation displacement blade** as claimed in claim 1 (and let alone a blade which forms an entry region capable of cutting and located in front of a contact region as is also set forth in claim 1). Accordingly, without such motivation, Applicants respectfully submit that the Examiner has not established a *prima facie* case of obviousness which would render any of claims 1-36 of the present application obvious. Accordingly, withdrawal of the rejection of claims 1-24 under 35 U.S.C. § 103 as being unpatentable over the alleged combination of Burmeister et al. in view of Onoue is respectfully requested.

### CONCLUSION

It is believed that all of the stated grounds of rejection have been properly traversed, accommodated, or rendered moot. Applicants therefore respectfully request that the Examiner reconsider and withdraw all presently outstanding rejections.

It is believed that a full and complete response has been made to the outstanding Office Action, and as such, the present application is in condition for allowance. Thus, prompt and favorable consideration of this amendment is respectfully requested.

If the Examiner believes that personal communication will expedite prosecution of this application, the Examiner is invited to telephone Timothy R. Wyckoff, Reg. No. 46,175 at (703) 668-8000.

Respectfully submitted,

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